

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CAMERON LACROIX

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Case No. 14-CR-10227-PBS

**DEFENDANT REBUTTAL TO THE GOVERNMENT'S OPPOSITION FOR U.S.  
PROBATION COMPULSION**

The government's opposition incorrectly asserts that this Court lacks authority to order U.S. Probation's compulsion for documents because the criminal case is closed or because a related civil action exists. As a matter of law, this Court retains the ability to direct U.S. Probation pursuant to 18 U.S.C. § 3603(10), which requires probation officers to "perform any other duty that the court may designate." That authority is not extinguished by the closure of the criminal case as defendants frequently serve out their supervised release while cases are administratively closed.


The defendant has not sought traditional discovery and has made clear that he is flexible as to the manner of review, including inspection, note-taking, or photographing documents of interest rather than reproducing records. The request is narrowly tailored to identifying evidence of government misconduct, a determination the defendant is best positioned to make based on his firsthand knowledge of the case.

Finally, the government's suggestion that the defendant must await discovery in the civil case ignores its own acknowledgment that the civil matter may not proceed. Government misconduct should be brought to light regardless of the outcome of a separate civil action.

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DISTRICT OF MASSACHUSETTS

Accordingly, the motion is properly before this Court and should be granted in the interests of justice.

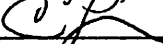
January 26, 2026

  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document is filed on ECF through the clerk's office and a copy will be provided to all registered participants via Notice of Electronic Filing (NEF).

January 26, 2026

  
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